

# WILLKIE FARR & GALLAGHER<sup>LLP</sup>

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December 24, 2018

## VIA ECF

The Honorable Deborah A. Batts  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 2510  
New York, NY 10007

Re: *SSI (Beijing) Company Ltd. v. Prosper Business Development Corporation*, No. 18-civ-8408

Dear Judge Batts:

This firm represents Petitioner SSI (Beijing) Company Ltd. (“SSI (Beijing)”) in the above-referenced action. Pursuant to Section I.E of Your Honor’s Individual Rules, we write on behalf of all parties to respectfully request that the Court grant an extension of time for the parties to brief the Motion for Judgment on the Pleadings and to Compel Arbitration (Dkt. No. 19) filed by Respondent Prosper Business Development Corporation (the “Motion”) and to adjourn the initial pre-trial conference (Dkt. No. 18) until after the Motion is resolved.

On November 29, 2018, this Court issued an order requiring the parties to appear for an initial pre-trial conference in accordance with Federal Rule of Civil Procedure 16 on January 31, 2019 at 10:30 a.m. (Dkt. No. 18.) Thereafter, on December 18, 2018, Respondent filed its Motion. Petitioner’s opposition to the Motion is presently due on January 2, 2019 and Respondent’s reply in further support of the Motion is presently due on January 9, 2019. Given that the Motion was served shortly before the Christmas holiday, the parties propose that Petitioner’s time to submit its opposition to the Motion be extended until January 30, 2019, and that Respondent’s time to submit its reply in further support of the Motion be extended until February 13, 2019. The parties also respectfully request that the Court adjourn the initial pre-trial conference until after the Motion is resolved.

December 24, 2018

The Honorable Deborah A. Batts

No prior request for such relief has been made by any party.

Respectfully submitted,

*/s/ Mary Eaton*

Mary Eaton

cc via ECF: Counsel of Record